

PIERCE & KWOK LLP
Aaron Pierce, Esq. (Bar No. 02056-2008)
299 Broadway, Ste. 1405
New York, New York 10007
(212) 882-1752
Attorney for Plaintiff

SAMANTHA SIVA KUMARAN, THE A STAR
GROUP, INC. d/b/a TIMETRICS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
(FOLEY SQUARE)
DOCKET NO.: 1:20-cv-08345-MKV-DCF

Plaintiffs,

CERTIFICATION OF COUNSEL

-V-

NORTHLAND ENERGY TRADING, LLC et al

Defendant.

I, Aaron Pierce, Esq., affirm the following under the penalty of perjury. Unless otherwise specified, all allegations made in this Certification are made upon information and belief based upon my discussions with my client and the papers and proceedings related to this matter to date.

1. I am co-founder and an equity holder in Pierce & Kwok LLP.
2. I am the attorney for THE A STAR GROUP, INC. ("Plaintiff") in the above-referenced action.
3. I make and sign this Certification in support of the firm's motion to be relieved as counsel (the "Motion").
4. Unfortunately, despite this firm's best efforts, Plaintiff and counsel have been unable to reach an agreement on how this matter should proceed due mostly to my incapacitation after a recent spinal surgery and a continuing family emergency, as well

as Plaintiff's non-payment of attorney's fees. As of today, counsel has not been paid in eight (8) months.

5. Out of good faith and the desire to help our client fight what we believe still to be a good fight against malicious adversaries, I continued to work for the client even though she had clearly breached the payment terms of our retainer agreement. It is only now that, given my lack of capacity, I can no longer continue working for this client.
6. As a result of this sudden incapacitation, ongoing family emergency, and continuing non-payment, it is impossible for this firm to continue representing Plaintiff.
7. There are no upcoming trial dates that would be affected by the Court granting the instant request. There is a due date on January 24, 2025 regarding a Motion to Strike and on February 11, 2025 regarding a motion to dismiss.
8. I am asserting a charging lien against Plaintiff The A Star Group, Inc. for unpaid legal fees.
9. Moreover, from May 8 to July 23 via email, and again from December 1 to January 15, I discussed this matter with Plaintiff, and informed them that I would be unable to continue as counsel given that I do not have the capacity to continue working for them and had not received any payment from them.
10. However, so that they can find and retain other counsel, Plaintiff requests a 60-day Stay of the proceedings.

WHEREFORE, our office respectfully requests that the Court grant the Motion in its entirety, and allow me to withdraw as counsel in the above-captioned case.

Dated: New York, New York
January 21, 2025

PIERCE & KWOK LLP



Aaron H. Pierce, Esq.
299 Broadway, Ste. 1405
New York, New York 10007
(212) 882-1752
Attorneys for Plaintiff
THE A STAR GROUP, INC.